

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KARL REINKE, an individual ,
Plaintiff,
v.
NORTHWEST TRUSTEE SERVICE, INC., a
Washington Corporation; AURORA LOAN
SERVICES, LLC, a Delaware Corporation;
BAC HOME LOANS SERVICEING, INC.,
f/k/a COUNTRYWIDE HOME LOANS
SERVICING, LP, a Foreign Corporation;
HOME CAPITAL FUNDING, a California
Corporation; FIRST AMERICAN TITLE
INSURANCE COMPANY, a Washington
Corporation; LAWYERS TITLE
INSURANCE COMPANY, a Nebraska
Corporation; WINSTAR MORTGAGE
PARTNERS, INC., a Minnesota Corporation;
and MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., a
National Association,
Defendants.

**JOINT STIPULATION
REGARDING DEADLINE FOR
RESPONSE TO COMPLAINT AND
PROPOSED ORDER**

Pursuant to Fed. R. Civ. P. 6(b), plaintiff, KARL REINKE (Plaintiff) and defendant, BAC Home Loans Servicing, LP (“Defendant”), through their undersigned counsel, hereby enter into this Stipulation and Proposed Order:

**JOINT STIPULATION REGARDING DEADLINE FOR
RESPONSE TO COMPLAINT AND PROPOSED ORDER- 1
CASE NO. 2:09-CV-01684-JLR**

116589.0154/1783705.1

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2 **I. STIPULATION**
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4 1. Plaintiff has asserted claims against BAC Home Loans Servicing, LP and other
5 defendants arising from their respective roles in enforcing the terms of Plaintiff's mortgage
6 obligations. Among other things, Plaintiff claims that several defendants are jointly and
7 severally liable for violations of "§ 807 of the Fair Debt Collection Practices Act." Plaintiff's
8 claims in this regard specifically implicate the Fair Debt Collection Practices Act, 15 U.S.C.
9 §§ 1962, *et seq.* BAC Home Loans Servicing, LP denies any liability.

10 2. Plaintiff filed his Amended Complaint in this matter in the Superior Court of
11 Washington for King County on October 28, 2009 (King County Cause No. 09-33298-3
SEA).

12 3. BAC Home Loans Servicing, LP removed this matter to this Court on
13 November 25, 2009.

14 4. Plaintiff has a Chapter 11 bankruptcy proceeding pending in the Bankruptcy
15 Court for the Western District of Washington, Cause No. 09-19609, and is attempting to
16 remove the matter as an adversary claim. The parties expect that Plaintiff will perfect his
17 removal within the next week.

18 5. The parties believe that it would promote judicial economy to extend the
19 deadline for BAC Home Loans Servicing, LP until ten (10) days after Plaintiff perfects the
20 removal to bankruptcy court to answer or otherwise respond to the Amended Complaint in
21 this action.

22 It is, therefore, STIPULATED AND AGREED, by and between the undersigned, the
23 attorneys of record for Plaintiff and Defendant in the above-entitled action, that Defendant
24 shall have up to ten (10) days following Plaintiff's perfection of the removal of this case to the
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JOINT STIPULATION REGARDING DEADLINE FOR
RESPONSE TO COMPLAINT AND PROPOSED ORDER- 2
CASE NO. 2:09-CV-01684-JLR

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1 bankruptcy court as an adversary proceeding to answer or otherwise respond to the Complaint
2 in this action.

3 Dated this 10th day of December, 2009.
4

5 LANE POWELL PC

RICHARD LLEWELYN JONES, PS

6 *John S. Devlin*
7

8 John S. Devlin III, WSB No. 23988
Attorneys for Defendant
9 BAC Home Loans Servicing, LP

PER TELEPHONIC AUTHORIZATION:
Richard L. Jones, WSB No. 12904
Attorneys for Plaintiff

John S. Devlin

10 II. ORDER
11

12 This matter having come before the Court on the Stipulation and joint request of the
13 Parties and good cause having been shown,

14 IT IS SO ORDERED:
15

16 DATED this ____ day of December, 2009.
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18 Honorable James Robart
United States District Judge
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JOINT STIPULATION REGARDING DEADLINE FOR
RESPONSE TO COMPLAINT AND PROPOSED ORDER- 3
CASE NO. 2:09-CV-01684-JLR

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